

**REPLY COMMENTS OF THE NATIONAL SKI PATROL SYSTEM,  
INC.**

**FCC DOCKET # 99-87**

The National Ski Patrol System, Inc., (NSP) a federally-chartered non-profit organization founded in 1938, submits herewith its reply comments in Docket WT 99-87, a Request submitted by the International Municipal Signal Assn. (IMSA) for waiver of § 90.203 (j)(4)-(5) of the Rules.

NSP supports the comments of Ritron Inc., in which Ritron provides cost data for incorporating 6.25 kHz-compliant vocoders into portable radios. Although Ritron's comments do not address the specific cost impacts of dual-band radios incorporating 6.25 kHz-compliant vocoders, their comments do mention that under existing Rules, manufacturers would have to incorporate 6.25 kHz capability even for design of a new analog-only product, or a modification or improvement of an existing product (e.g. adding a GPS location feature, or encryption feature). The cost of providing 6.25 kHz compliance to an analog-only product would be a waste of time and effort.

The comments of Icom America Inc. ("Icom") reflect their contention that "digital" radios (radios having 6.25 kHz capability) cost no more than analog radios, and further suggest that digital radios may cost less than analog radios. Icom does not discuss dual-band radios, the prices of such radios, or the cost impact of providing 6.25 kHz capability in a dual-band radio, such as is used by the National Ski Patrol and other, primarily volunteer, first responder organizations. Icom's comments appear to be contradictory in that they "support the recent FCC ruling that public safety should utilize equipment with analog FM capabilities on the interoperability channels," while later in the same paragraph, they state that "(P25) is clearly the accepted digital interoperability standard of the public safety community." In fact, many small rural public safety agencies use analog communications equipment, and have neither the need nor the budget for the conversion to P25 equipment. Icom further states that there is "no rationale for requiring a single 6.25 kHz standard." The purpose of IMSA's Request for Waiver was to delay the mandatory implementation of 6.25 kHz digital capability into all Part 90 radios, not to require a single standard (although that wouldn't be a bad idea either). Icom concludes by claiming that the "two-way radio industry has now successfully begun its analog-to-digital transition and must continue as spectrum is becoming scarcer." Icom neglects to mention

that the costs associated with the conversion to digital – replacing all portable, mobile, and base station/repeater equipment, is of tremendous financial benefit to equipment manufacturers, and may provide little or no benefit to small, rural, primarily volunteer, self-funded first responder organizations such as ski patrols, fire departments, and search-and-rescue groups.

The comments of the Government Wireless Technology & Communications Association (“GWTCA”) mirror those of Icom’s. GWTCA’s comments do not address the substantial cost impact of providing 6.25 kHz capability in dual-band equipment commonly used by certain first responders.

The comments of Powerwerx, an importer of inexpensive dual-band, Part 90 approved analog radio equipment, are strongly supported by NSP. Powerwerx’s customers include rural, volunteer, self-funded first responder organizations like NSP. The volunteers who use Powerwerx radios to perform their first-responder duties need to use radio equipment which is compatible with the other public safety agencies in their areas. These other agencies use analog too, although some operate in VHF and others in UHF. That is why dual-band radio equipment is vital to the volunteers’ efforts.

NSP urges the Commission to grant the Request for Waiver as submitted by IMSA, and recognize the important work provided by over 80,000 volunteer first responders in the United States.

Respectfully submitted,

**NATIONAL SKI PATROL SYSTEM, INC.**

**By:** /s/ Richard S. Woolf

Richard S. Woolf

National Telecommunications Advisor

133 S. Van Gordon St.

Lakewood, CO 80228

*Tel 718 543-1222*

[telecom@nsp.org](mailto:telecom@nsp.org)

[\*www.nsp.org\*](http://www.nsp.org)